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December 28, 2023

VIA ECF

Honorable James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") (collectively, the "City Defendants") in the above-referenced matter. I write pursuant to the Court's orders dated December 5, 2023, and December 21, 2023, directing Defendants to respond to Plaintiffs' Motion to Proceed Anonymously (ECF No. 21) (the "Motion").¹

City Defendants consent to the Motion. This office, however, is still determining whether it will represent any of the individual defendants named in the Complaint.² Accordingly, I respectfully request that the Court extend the individual defendants' deadline to respond to the Motion until January 22, 2024, *sua sponte* to afford the individual defendants sufficient time to respond. Plaintiffs consent to the requested extension of the individual defendants' time to respond until January 22, 2024.

¹ I very much appreciate the Court's extension of Defendants' time to respond to the Motion *nunc pro tunc* and apologize for my failure to respond by December 19, 2023, as directed.

² In addition to the City Defendants, the Complaint names as individual defendants Ariel Semper, Nadine Cenord, Bernadet Jean-Louis, Donna McFadden, Ana Costa, Taiesha Coleman and Leydi Taveras.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel